

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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	)	
<b>IN RE:</b>	)	<b>Chapter 11</b>
	)	
<b>W.R. GRACE &amp; CO., et al.,</b>	)	<b>Case No. 01-01139 (JKF)</b>
	)	<b>Jointly Administered</b>
	)	
<b>Debtors.</b>	)	
	)	
	)	<b>[proposed] Response Date: June 14, 2007</b>
	)	<b>[proposed] Hearing Date: June 21, 2007</b>
	)	

**MOTION FOR LEAVE TO LIMIT TIME, SHORTEN NOTICE, AND  
MODIFY CASE MANAGEMENT ORDER**

COMES NOW Motley Rice LLC (“Motley Rice”), pursuant to Del. Bankr. LR 9006-1(e), Rule 9006(c) of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”) and section 102 of Title 11 of the United States Code (“Code”), for an Order shortening the notice period with respect to Motley Rice’s Motion for Protective Order concerning the noticed deposition of Motley Rice (the “Motion”) filed contemporaneously herewith, so that the Motion may be heard at the June 21, 2007 hearing:

1. Bankruptcy Rule 9006(c) provides that “the court for cause shown may in its discretion with or without motion or notice order the period reduced.” Delaware Local Rule 9006-1(e) similarly provides that “no motion will be scheduled on less notice than required by these Rules or the Fed. R. Bankr. P. except by Order of the Court, on written motion ... specifying the exigencies justifying shortened notice.”
2. The Court has set the following schedule with respect to Expedited Motion Protocol in the Newly Amended Case Management Order for the Estimation of Asbestos

Personal Injury Liabilities: “Party files Motion; Responses must be filed within 14 days of service of the motion; Replies must be filed within 7 days of service of the response; The Court will schedule a telephonic hearing at its earliest convenience after the responses and replies to the motion are filed.” (Docket No. 15923)

3. It is Motley Rice’s understanding that Debtor and the Asbestos Claimants Committee (“ACC”) have already agreed that the Debtor’s Response to the ACC’s Motion for Protective Order concerning these depositions is June 14th, 2007 and that the matter will be addressed in the hearing that is scheduled for June 21, 2007 @ 8:30 a.m. in Pittsburgh, Pennsylvania.
4. Accordingly, Motley Rice files this Motion seeking an Order of this Court for leave to file its Motion for Protective Order and to enable Motley Rice to have its Motion for Protective Order heard at the June 21, 2007 hearing. Motley Rice also respectfully requests that this Court establish June 14, 2007 at 4:00 pm as the deadline to object to Motley Rice’s Motion for Protective Order.

Dated: June 4, 2007.

RESPECTFULLY SUBMITTED,

/s/ John E. Herrick  
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